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IDAHO FISH & GAME

PANHANDLE REGION
2750 Kathleen Avenue
Coeur d'Alene, Idaho 83814

Dirk Kempthorne/Governor
Rod Sando/Director

June 14, 2000

RECEIVED

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Coeur d'Alene
Regulatory Branch

Mr. Gregg Rayner
US Army Corps of Engineers
3815 Schreiber Way
Coeur d'Alene, ID 83815

Dear Gregg:

REFERENCE: 001200800 POTLATCH CORP. / ST. JOE RIVER

We have reviewed the proposal by Potlatch Corporation to excavate contaminated soils along approximately 800 feet of the St. Joe River at the old Avery railroad switch-yard. Following excavation of the contaminated soils, the applicant proposes to fill the site with clean soils and rock riprap. The St. Joe River supports a nationally recognized westslope cutthroat trout fishery, and supports a small but viable population of migratory bull trout.

Based on our observations at the site, we believe that much of the soil contaminated by petroleum products is fill material brought in to construct the switch-yard. Removal of the contaminated fill, and not replacing it with clean fill, would help to restore some of the river's floodplain. In turn, this would provide benefits to the hydrologic function of the river, and for fish and wildlife habitat. Our recommendation is for the applicant to remove the contaminated fill down to the level of the floodplain, and plant native riparian vegetation (such as willows from nearby sources or on-site) along the reestablished floodplain. The remaining clean fill could be armored with a combination of vegetation and either rock or a bio-engineered revetment. The Corps' proposed special condition of vegetation plan would fit in with this recommendation. If the applicant is willing to do so, we would welcome the opportunity to work with them to develop a small fishing pond for public use in the reestablished floodplain area.

Our preference is to see the fill removed and not replaced, as described above. As currently proposed, with special conditions proposed by the Corps, the project would result in some improvement for fish and wildlife over the existing condition, but floodplain function and habitat, and instream fish habitat would continue to be impaired due to the encroachment on the floodplain. If this alternative is chosen, we recommend installing a series of three to four bank barbs along the riprap, with large woody debris

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incorporated into the barbs, to improve conditions for fish and dissipate energy along the riprapped bank.

We agree with other special conditions proposed by the Corps to minimize sediment delivery to the river during excavation. These include working during the low flow period and isolating the work site as necessary with silt fence or other measures. With implementation of appropriate BMPs, bull and cutthroat trout are unlikely to be negatively impacted by the project. Further protection for bull trout can be provided by timing the project to avoid the period when bull trout move through this area (September and October, based on radio-tagging data).

Implementation of this project has the potential to significantly improve conditions for fish and wildlife through this reach of the river by eliminating fill which is encroaching into the river and floodplain. If the applicant is willing to take the project further and create a fishing pond for the public, the benefits could be increased even further.

Thanks for the opportunity to comment. Chip Corsi of my staff will be the contact if further discussion of these comments or the project is desired.

Sincerely



Greg Tourtlotte
Regional Supervisor

GIT:CEC:njk

C: Tracey Trent, IDFG, Boise
DEQ, Coeur d'Alene